

REMARKS

In the Office Action dated August 9, 2007, the Examiner rejected claims 1-3, 17, 18 and 20 under §102(b) as being anticipated by Burkland. Claims 4-11, 19, 21 and 24-26 were rejected under §103(a) as being unpatentable over Burkland in view of Ueda, et al or Neher or Ishikawa, et al. Claims 12, 13, 15 and 22 were rejected under §103(a) as being unpatentable over the applied art as applied to claims 1-11, 17-21 and 24-26 and further in view of Johnson, Neueder or Ellegard.

Claims 14, 16 and 23 were rejected under §103(a) as being unpatentable over the applied art as applied to claims 1-11, 17-21 and 24-26 and further in view of either Gatti, et al or Japan '200.

The claimed invention has been clarified with an amendment to claim 1 which defines a mounting bracket for a pump of a washing machine in which the mounting bracket is a single piece resilient in body having a lower portion with at least two legs extending therefrom adapted to mount on the washing machine base. The single piece body also has an upper portion with at least two holes configured to receive legs from the pump to support the pump. Further, the single piece body has a web interconnecting a first end of the lower portion to a first end of the upper portion and interconnecting a second end of the lower portion to a second end of the lower portion.

The patent to Burkland discloses a mounting arrangement for a washing machine pump in which a bracket is provided which attaches to the base of the washer by threaded fasteners. The bracket 61 carries a post 63 which extends through openings in a channel shaped bracket 60 which carries the pump. Arranged between the post 63 and the pump bracket 60 are pivot bearings 64 and 65 allowing the pump 21 to be pivotally mounted to the base frame 22. The Examiner asserts that pivot bearings 64 and 65 are dampers which dampen vibrations, however, there is absolutely no statement to that effect in the Burkland patent. In fact, Burkland states "each of the conduits connected to the pump are sufficiently flexible to permit a limited amount of relatively free movement of the pump 21 about the pivot 63." (column 3, lines 41-43). From this statement, it does not appear that the pivot bearings 64 and 65 are dampers. To provide the support for the pump, the bracket 61 and post 63 of Burkland appear to be required to be rigid rather than resilient. The upper portion, which the Examiner equates to the pivot pin 63 does not

have at least two holes configured to receive legs from the pump, nor is there a web interconnecting a first end of the lower portion to a first end of the upper portion or interconnecting a second end of the lower portion to a second end of the upper portion. For each of these reasons, Applicants respectfully submit that claim 1 is not anticipated or rendered obvious by Burkland.

The Examiner relied on Ueda, et al, Neher and Ishikawa, et al as disclosing mounting legs. Ueda, et al discloses a motor mount in which the motor is secured to bosses extending from the wash tub in an arrangement quite different from that set forth in amended claim 1. Ueda, et al does not disclose a single piece resilient body nor at least two holes in the body configured to receive legs from a pump nor a web interconnecting a lower portion of the body to an upper portion of the body. The patent to Neher discloses a mount for a motor in which a bracket 6 carrying the motor is attached to a resilient member 11 and a second bracket 14 which is secured to the fan housing by threaded fasteners clamps onto the resilient member. Neher does not disclose a mounting bracket with at least two legs extending therefrom adapted to mount on a washing machine base. Further, Neher does not disclose a single piece body with an upper portion having at least two holes configured to receive legs from a pump. Finally, Neher does not disclose a web interconnecting a first end of the described lower portion to a first end of the described upper portion. The Examiner points to Ishikawa, et al as disclosing mounting legs, however, the mounting structure for a motor and compressor in a vehicle, as disclosed in Ishikawa, et al is structurally quite different from the mounting bracket defined in claim 1. The mounting legs of Ishikawa, et al, if transplanted onto the Burkland would not render the structure defined by claim 1 obvious.

The patent to Gatti, et al discloses a shock mount for a computer peripheral in which two brackets are isolated from each other by vibration isolators 50. One of the brackets has holes 91, 92 for receiving screws 82. There is no web interconnecting the two portions of the bracket to result in a one piece body. The computer peripheral does not have legs that are received in holes in the bracket, nor does the bracket have legs which are received in some other portion of the equipment. In fact, Gatti, et al discloses that the lower bracket also include holes 71, 72 to facilitate securing the mounting plate 10 to the equipment enclosure. Combining any features of Gatti, et al with the structure of Burkland would not assist in rendering the structure defined by claim 1 as obvious.

The Japan '200 disclosure shows a bracket for receiving a pump 1. The pump has lower flanges 6 that are captured in a damper member (FIG. 9) which then is received in a space formed by a folded over portion of a bracket 15. The construction of the mounting bracket of Japan '200 is quite distinct and different from the arrangement defined in claim 1 and even taking the teaching from Japan '200 and importing it into the structure of Burkland would not render the structure defined in claim 1 obvious.

The patents to Johnson, Neuder, et al and Ellegard are relied on by the Examiner only for showing twist lock arrangement, and none of these references teach or suggest the structural elements of claim 1 that are missing from the other references discussed above.

None of the references relied on by the Examiner notice that a single piece resilient body having a lower portion and an upper portion with a web interconnecting the lower portion and upper portion and a damper between the upper and lower portions, nor do they teach or disclose the lower portion having two legs extending therefrom adapted to mount on a washing machine base or an upper portion with two holes to receive legs from a pump. Since there are a number of elements defined in claim 1 which are completely missing from each of the references relied on by the Examiner, Applicants respectfully submit that claim 1, and each of its dependent claims, are patentably distinguishable over the references.

Independent claim 18 defines an improved washing machine with a base having at least two holes therein, a pump having at least two legs extending therefrom and a bracket for mounting the pump to the base. The bracket includes a single piece resilient body with a lower portion having at least two legs extending therefrom adapted to be received in the at least two holes in the base to mount the bracket on the washing machine base. The bracket also includes an upper portion with at least two holes configured to receive the at least two legs from the pump to support the pump on the bracket. The bracket further includes a web interconnecting a first end of the lower portion to first end of the upper portion and interconnecting a second end of the lower portion to a second end of the upper portion.

Several of the structural elements are discussed above with respect to independent claim 1 and the deficiencies of the prior art relied on by the Examiner has been pointed out in detail. Applicant respectfully submits that the structural arrangement defined by claim 18 is not taught

or suggested by the references relied on by the Examiner and Applicants respectfully submit that claim 18 and its dependent claims are each allowable over the references.

Applicants have added new claim 27 which defines a mounting bracket for a pump of a washing machine. The bracket comprises a single piece resilient body having a lower portion with at least two legs and a center pin extending therefrom adapted to engage with and mount on the washing machine base. The bracket also comprises an upper portion with at least two leg holes and one control hole configured to receive at least two legs and a center pin from the pump to support the pump. Further, the mounting bracket comprises a web interconnecting at least one end of the lower portion to at least one end of the upper portion and with a damper between the upper and lower portions.

Applicants have already discussed the deficiencies of the prior art with respect to a single piece resilient body having a lower portion in an upper portion connected by a web. New claim 27 further defines the lower portion having not only two legs but also a center pin and the upper portion having not only at least two openings but also a control hole configured to receive a center pin from the pump. The references relied on by the Examiner do not disclose such an arrangement.

In view of the foregoing, Applicants respectfully submit that new claim 27 is patentably distinguishable over the references relied on by the Examiner.

In view of the foregoing amendments and discussion, Applicants respectfully submit that each of the claims of the application are allowable and respectfully request the Examiner to indicate all claims as allowed and to pass the application to issue.

Respectfully submitted,

_____/Kevin W. Guynn/_____(Reg. No. 29,927)
Kevin W. Guynn
GREER, BURNS & CRAIN, LTD
Customer Account No. 24978